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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TODD P. EVANS, an individual,

Plaintiff,

vs.

LANDER COUNTY HOSPITAL DISTRICT
d/b/a BATTLE MOUNTAIN GENERAL
HOSPITAL; and DOES 1 through 100,
Inclusive,

Defendant.

Case No: 3:19-cv-00464-LRH-WGC

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
PLAINTIFF'S RESPONSE AND
DEFENDANT'S REPLY IN SUPPORT
OF DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT**

(FIRST REQUEST)

Pursuant to Local Rule IA 6-1, Plaintiff TODD P. EVANS ("Plaintiff") and Defendant LANDER COUNTY HOSPITAL DISTRICT d/b/a BATTLE MOUNTAIN GENERAL HOSPITAL ("Defendant," and collectively with Plaintiff, the "Parties"), by and through their respective undersigned counsel, hereby respectfully request, for good cause, that the Court grant the Parties' stipulation to extend briefing on Defendant's Motion for Summary Judgment ("Motion"). Defendant's Motion was filed on November 23, 2020 [ECF No. 23], and no hearing date has yet been set for Defendant's Motion.

This is the Parties' first request to extend briefing on Defendant's Motion. In the absence of an extension, the Parties agree that their heavy caseloads would prevent them from preparing a full and thorough opposition and reply to assist the Court in its decision on the Motion. Good cause therefore supports the Parties' request.

Accordingly, the Parties request the following:

1. Plaintiff shall have up to and including January 4, 2021 to file Plaintiff's Response to Defendant's Motion;
2. Defendant shall have up to and including January 25, 2021 to file a Reply in support of Defendant's Motion.

This stipulation is submitted based on good cause, and is not made for the purpose of delay. The Parties observe that the deadline for filing the Pre-Trial Order is suspended until 30 days after entry of a decision on Defendant's Motion.

IT IS SO STIPULATED.

DATED this 7th day of December, 2020.

**WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP**

LEMONS, GRUNDY & EISENBERG

By: /s/ Bradley Schrager
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*Attorneys for Defendant Lander County
Hospital District d/b/a
Battle Mountain General Hospital*

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT
JUDGE

DATED: 12/8/20

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of December, 2020, a true and correct copy of the
**STIPULATION AND ORDER TO EXTEND TIME TO FILE PLAINTIFF'S
RESPONSE AND DEFENDANT'S REPLY IN SUPPORT OF DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT** was served via the United States District Court
CM/ECF system on all Parties or persons requiring notice.

By: /s/ Dannielle Fresquez
Dannielle Fresquez, an Employee of
WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP